

ETERNITY MART, INC.)	Western District of WA - 2:20-mc-00002 RSL
d/b/a GREAT DEALS OF TEXAS,)	
)	Case No. 19-CV-02436
Plaintiff,)	
)	
v.)	District Judge John J. Tharp, Jr.
)	
NATURE’S SOURCES, LLC,)	Magistrate Judge Sunil R. Harjani
)	
Defendant.)	

Gary Zhao declares as follows:

2. I make this declaration in support of the motion by Defendant to compel production of documents from Amazon.com, Inc. (hereinafter “Amazon”) pursuant to a validly issued *subpoena duces tecum* (hereinafter the “Subpoena”) in the matter titled *Eternity Mart, Inc. d/b/a Great Deals of Texas v. Nature’s Sources, LLC*, case No. 19-CV-02436, pending in the District Court for the Northern District of Illinois. *See* Exhibit 3 for a true and accurate copy of Defendant’s Subpoena to Amazon on October 10, 2019.

3. On October 23, 2019, Amazon objected to Defendant's Subpoena. *See* Exhibit 4 for a true and accurate copy of Amazon's Objections to the Subpoena.

4. Following the parties' meet and confer on December 6, 2019, Amazon's counsel wrote on December 23, 2019, confirming that Amazon stood by its objections. *See* Exhibit 1 for the said email of Amazon's counsel.

I declare, under penalty of perjury of the laws of the United States, that the foregoing is true and accurate to the best of my knowledge.

Executed this 6th day of January, 2020, at Chicago, Illinois.

SMITHAMUNDSEN LLC

By: /s/ Gary Zhao
One of the Attorneys for Defendant
NATURE'S SOURCES, LLC

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